

EXHIBIT A

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

CAROL S. MARCELLIN, individually, and
as Co-Administrator of the Estate of
Charles E. Hollowell, deceased, and JES-
SICA HOLLOWELL-McKAY, as Co-Admin-
istrator of the Estate of Charles E. Hollow-
ell, deceased,

Plaintiffs,

v.

HP INC., and STAPLES, INC.,

Defendants.

Civ. No. 1:21-cv-00704-
JLS

**AFFIDAVIT OF DAVID PIPHO IN SUPPORT OF
MOTION FOR PROTECTIVE ORDER**


David Pipho, being duly sworn, deposes and says as follows:

1. I am over the age of eighteen (18) years and I believe in the obligations of an oath. I submit this affidavit in support of the Motion for Protective Order filed herewith on the basis of my personal knowledge.
2. I am employed as an Electrical Engineer in HP Personal Systems Quality by the Defendant, HP Inc., incorrectly named as Hewlett-Packard Company ("HP"), in the above-captioned lawsuit.
3. I am not in the battery unit at HP.
4. At all times relevant hereto (i.e. from the time of the plaintiff's alleged purchase of the notebook computer in 2011 until the date of the fire in this case on January 24, 2020), I played no role in decisions by HP to take action related to counterfeit batteries.
5. Specifically, during the relevant time, I played no role in the decision of whether to notify

end users regarding any alleged dangers of counterfeit replacement batteries.

6. I vaguely recall some conversations a few years back with Lee Atkinson about counterfeit batteries but nothing specific. These conversations were not part of my official duties at HP but were instead Mr. Atkinson generally discussing the issue with me.

Signed under pains and penalty of perjury Tuesday, January 30, 2024.



David Pipho